

**REMARKS**

The Applicant respectfully requests further examination and reconsideration in view of the above amendments and the arguments set forth fully below. Claims 1-54 were pending. Within the Office Action, Claims 1-54 have been rejected. Accordingly, Claims 1-54 are remain pending.

**Claim Rejections Under 35 U.S.C. § 103**

Within the Office Action, Claims 1, 5, 6-9, 11, 12, 16-22, 26-30, 41 and 52 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2004/0098379 issued to Huang (hereafter “Huang”) in view of U.S. Patent Application Publication No. 2002/0022453 issued to Balog et al. (hereafter “Balog”). The Applicant respectfully disagrees because neither Huang, Balog or their combination teach wherein the routing software detects the secondary devices coupled to the computer.

Huang teaches a computer program that organizes and manages media files. The computer program includes a database management system for organizing data stored locally on a computer, and a graphical user interface (GUI) for selectively accessing the organized data. [Huang, § 0025] This organization structure is nothing more than a relational database with pointers and indexes. [Huang, § 0032] The media files being managed are locally stored and accessed. In general, there is no transmitting of data from the local computer to secondary devices, such as an MP3 player or a video recorder. In particular, there is no transmitting of data based on the organization of the media files. The Huang application is specifically designed to organize and manage data locally stored in a database on the local computer on which the application is loaded. As such, Huang does not teach wherein the routing software detects the secondary devices coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted. For the same reasons, Huang does not teach the routing software compares the data format with a set of values that determine where the digital media content is to be transmitted. As acknowledged on page 4 of the Office Action, Huang also does not teach a controller coupled to the storage device to selectively transmit the digital information based on the type to one or more secondary devices. Accordingly, Huang does not teach the presently claimed invention.

Balog teaches a method for delivering content to a plurality of mobile devices coupled to each other and participating in a communication network. The mobile devices interoperate via a

number of radio technologies such as the IEEE 802.11 wireless specification. [Balog, § 0021] The content includes a plurality of data types and is delivered from a service provider to at least one of the mobile devices depending on the characteristics of the data and the characteristics of the device. [Balog, Abstract] Balog teaches that a user with a plurality of devices is able to define a list of preferred devices and create a mapping of the type of content that each of the devices can render. [Balog, § 0031] However, Balog does not teach wherein the routing software detects the secondary devices coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted. Instead, Balog teaches that the content routing application of the mobility server uses user profiles to route content to the correct user, at a specified time, using the most appropriate communication protocol and path to the preferred device. [Balog, § 0029] The routing application of Balog does not detect which secondary devices are coupled to the computing device. Further, Balog does not teach the routing software is configured to compare the data format with a set of values that determine where the digital media content is to be transmitted. Instead, only general content types are discussed in Balog. [Balog, Figure 4] Indeed, the “types” of Balog are so broad that they encompass many data formats. For example, one of the “types” taught by Balog is “Video/Media Stream” which can be many different data formats such as mp3, wave, avi, etc. As a result, it is clear that Balog does not teach to compare a data format, but instead only teaches referencing a generalized content type that could be any of a multitude of data formats. Accordingly, Balog does not teach the presently claimed invention.

Within the Office Action of December 23, 2009, it is asserted that Balog teaches the claimed detecting of secondary devices by paragraphs [0023] and [0036] and Figures 5 and 6. Specifically, it is stated within the Office Action that “Balog teaches distributing content, such as video, audio, photos, etc, to devices 16 after determining the device’s availability by establishing which devices are connected to service provider 42 at any given moment.” [Office Action, page 2] However, the cited portions do not teach wherein a routing software detects one or more secondary devices, instead it merely teaches that the devices self-register with the mobility server 34. In other words, the service provider 42 which comprises the mobility server 34 does not have to try and detect any coupled devices, because the devices register with the mobility server 34 whenever they move into a connectivity area. [Balog, § 0036] A device self registering is not the same as routing software being configured to actively detect any devices coupled to a computing device. Indeed, in the system of Balog if a device fails to register it will not be discovered by the service provider, whereas the routing software of the presently claimed invention automatically

detects secondary devices when they are coupled to the computing device. Thus, Balog does not teach wherein the routing software is configured to detect the secondary devices coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted. Accordingly, Balog does not teach the presently claimed invention.

Within the Office Action of June 18, 2010, it is reasserted that Balog teaches the claimed detecting of secondary devices by paragraphs [0023], [0029] and [0036] and Figure 5. [Office Action, page 2] Specifically, it is asserted that “the routine software represented by figure 5 clearly depicts in steps 120 and 130 that a system routing software creates a list of available devices 16 which may receive content and a mobility server 34 determine 130 the status of the available devices.” [Office Action, page 2] However, again, the above cited portions of Balog do not teach the detecting of secondary devices. Instead, paragraph [0023] merely discuss the compiling of device characteristics (including device addresses) into a global profile, not how the device address or the devices themselves where discovered/detected. Further, paragraph [0029] of Balog merely teaches the use of a user device configuration in the routing operation, it does not teach that the devices, instead of self-reporting, are detected by the system of Balog. Finally, as described above, not only does paragraph [0036] not teach the detection of the devices, contrarily, it teaches that the devices self-register with the mobility server 34. Specifically, paragraph [0036] states “the device 16 is preferably configured to *register* its location with the mobility server 34 every time it moves into the connectivity area of a new access point 20.”

In other words, the server of Balog does not detect when a device connects to the network, but instead the devices themselves register with the server. As a result, as described above, if the devices failed to register, the server of Balog would not know the devices were there because it does not detect the devices for itself. Indeed, all the subsequent discussion of device lists and their compilation are irrelevant as they do not speak to how the devices were detected. Specifically, although it is asserted in the Office Action of June 18, 2010 that the teaching of creating a list of available devices inherently also teaches the detection of said devices, this logic is incorrect. [Office Action, page 3] A list of available devices could very easily be created without actively detecting them if, as is the case in Balog, the devices self-registered “every time” that they connect to the network. Therefore, again, the only teaching within Balog regarding the discovery of the devices is that, as quoted above, the devices of Balog are configured to self-register with the network such that they do not need to be detected. Accordingly, Balog simply does not teach wherein the routing software detects the secondary

devices coupled to the computer and to compare the type with a set of values that determine where the digital media content is to be transmitted.

In contrast to the combined teachings of Huang and Balog, the computing device of the presently claimed invention performs automatic content sorting and network routing by file type. The computing device has a central processing unit and a storage device. The storage device stores digital content downloaded from the server and a routing software application. The routing software compares the file types of the digital content with set values that determine where the digital content is routed. Specifically, the routing software utilizes a routing table that defines which type of file is associated with which secondary device. The routing software automatically detects which secondary devices are coupled to the computing device and selectively transmits the digital content to the appropriate secondary device(s) according to the routing table. As discussed above, neither Huang, Balog nor their combination teach wherein the routing software detects the secondary devices coupled to the computer and to compare the data format with a set of values that determine where the digital media content is to be transmitted.

The independent Claim 1 is directed to an apparatus for automatically routing digital information. The apparatus of Claim 1 comprises an interface coupled to receive downloaded digital information having a type, a storage device coupled to the interface to store the digital information and a routing software, wherein the routing software detects one or more secondary devices coupled to a computing device and to compare the type with a set of values that determine where the digital information is to be transmitted and a controller coupled to the storage device to automatically sort and selectively transmit the digital information based on the type to the one or more secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 1 is allowable over the teachings of Huang, Balog, and their combination.

Claims 5-9 and 11 are dependent upon the independent Claim 1. As discussed above, the independent Claim 1 is allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claims 5-9 and 11 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 12 is directed to an apparatus for automatically routing digital information from a computing device to one or more secondary devices. The apparatus of Claim

12 comprises an interface coupled to receive downloaded digital information having a type, a storage device coupled to the interface to store the digital information and a routing software, wherein the routing software detects the secondary devices coupled to the computing device and to compare the type with a set of values that determine where the digital information is to be transmitted; and a controller coupled to the storage device to automatically determine which type of digital information is routed to which secondary device and selectively transmit the digital information based on the type to the one or more secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 12 is allowable over the teachings of Huang, Balog, and their combination.

Claims 16-21 are dependent on the independent Claim 12. As discussed above, the independent Claim 12 is allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claims 16-21 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 22 is directed towards an apparatus for automatically routing digital media content from a computing device to one or more secondary devices. The apparatus of Claim 22 comprises an interface coupled to receive downloaded digital media content having a type, a storage device coupled to the interface to store the digital media content and a routing software, wherein the routing software detects the secondary devices coupled to the computing device and to compare the type with a set of values that determine where the digital media content is to be transmitted and a controller coupled to the storage device to automatically determine which type of media content is routed to which secondary device utilizing a routing table and selectively transmit the digital media content based on the type to the one or more secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 22 is allowable over the teachings of Huang, Balog, and their combination.

Claims 26-30 are dependent on the independent Claim 22. As discussed above, the independent Claim 22 is allowable over the teachings of Huang, Balog, and their combination.

Accordingly, Claims 26-30 are all also allowable as being dependent upon an allowable base claim.

The independent Claim 41 is directed to a method for routing digital information from a computing device to one or more secondary devices based on a routing software that compares a type with a set of values that determine where the digital information is to be transmitted. The method of Claim 41 comprises receiving the digital information having the type, automatically sorting the digital information based on the type, automatically detecting the secondary devices coupled to the computing device and automatically transmitting the digital information based on the type to a corresponding one or more of the secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 41 is allowable over the teachings of Huang, Balog, and their combination.

The independent Claim 52 comprises an apparatus for automatically routing digital information comprising media content of different media types including music, video and data. The apparatus of Claim 52 comprises an interface coupled to receive downloaded digital information having a media type, a storage device coupled to the interface to store the digital information and a routing software, the routing software detects one or more secondary devices coupled to a computer and to compare the media type with a set of values that determine where the digital information is to be transmitted and a controller coupled to the storage device to automatically sort and selectively transmit the digital information based on the media type to the one or more secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 52 is allowable over the teachings of Huang, Balog, and their combination.

Within the Office Action, Claims 2, 13, 23, 31-33, 37, 40 and 42 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Huang in view of Balog and further in view of U.S. Patent No. 6,253,207 to Malek (hereafter “Malek”). The Applicant respectfully disagrees.

Claim 2 is dependent on the independent Claim 1. Claim 13 is dependent on the independent Claim 12. Claim 23 is dependent on the independent Claim 22. As discussed above, the independent Claims 1, 12 and 22 are allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claims 2, 13 and 23 are all also allowable as being dependent upon an allowable base claim.

As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. As further discussed above, neither Huang, Balog nor their combination teach wherein the routing software is configured to compare the data format with a set of values that determine where the digital media content is to be transmitted. As acknowledged on page 16 of the Office Action, neither Huang, Balog nor their combination teach a computing device coupled to the server, the server including digital information.

Malek teaches a method and apparatus for separately transporting each monomedia stream of a composite multimedia signal across a network, such as an ATM network. Malek generally teaches the transfer of packet information from one server to another. [Malek, col. 4, lines 6-27] The packets of Malek are embedded with addresses to determine the destination. Malek does not teach any apparatus or method that routes digital information to an appropriate secondary device by file type. Malek does not teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. Malek also does not teach wherein the routing software compares the data format with a set of values that determine where the digital media content is to be transmitted.

Accordingly, neither Huang, Balog, Malek nor their combination teaches a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device or wherein the routing software compares the data format with a set of values that determine where the digital media content is to be transmitted.

The independent Claim 31 is directed to a network of devices for automatically routing digital information. The network of Claim 31 comprises a server including digital information, a computing device coupled to the server for obtaining and automatically transmitting the digital information based on the type, the computing device comprising routing software to compare a type with a set of values that determine where the digital information is to be transmitted and one

or more secondary devices coupled to the computing device for receiving the digital information from the computing device, wherein the routing software detects the secondary devices coupled to the computing device. As discussed above, neither Huang, Balog, Malek nor their combination teaches a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 31 is allowable over the teachings Huang, Balog, Malek, and their combination.

Claims 32, 33, 37 and 40 are dependent upon the independent Claim 31. As discussed above, the independent Claim 31 is allowable over the teachings of Huang, Balog, Malek, and their combination. Accordingly, Claims 32, 33, 37 and 40 are all also allowable as being dependent upon an allowable base claim.

Claim 42 is dependent on the independent Claim 41. As discussed above, the independent Claim 41 is allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claim 42 is also allowable as being dependent upon an allowable base claim.

Within the Office Action, Claims 3, 4, 14, 15, 24 and 25 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Huang in view of Balog and further in view of U.S. Patent No. 7,043,477 to Mercer et al. (hereafter “Mercer”). The Applicant respectfully disagrees.

Claims 3 and 4 are dependent on the independent Claim 1. Claims 14 and 15 are dependent on the independent Claim 12. Claims 24 and 25 are dependent on the independent Claim 22. As discussed above, the independent Claims 1, 12, and 22 are each allowable over the teachings of Huang, Balog, and their combination. Accordingly, Claims 3, 4, 14, 15, 24, and 25 are all also allowable as being dependent upon an allowable base claim.

Within the Office Action, Claims 10, 43-45 and 47-50 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Huang, Balog and further in view of U.S. Patent Publication No. 2003/0167318 to Robbin et al. (hereinafter “Robbin”). The Applicant respectfully disagrees.

As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. As further discussed above, neither Huang, Balog nor their combination teach wherein the routing software is configured to compare the data format with a set of values that determine where the digital media content is to be transmitted. As acknowledged on page 16 of

the Office Action, neither Huang, Balog nor their combination teach a computing device coupled to the server, the server including digital information.

Robbin is directed to intelligent synchronization of a media player with a host computer. Specifically, Robbin teaches synchronization can be automatically initiated and performed upon connection of a data link between the media player and the host computer. [Robbin, Abstract] However, Robbin does not teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. Robbin also does not teach wherein the routing software compares the data format with a set of values that determine where the digital media content is to be transmitted. Accordingly, Robbin does not teach the presently claimed invention.

Accordingly, neither Huang, Balog, Robbin nor their combination teaches a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device or wherein the routing software compares the data format with a set of values that determine where the digital media content is to be transmitted.

The independent Claim 45 is directed to a method for routing digital information from a computing device to one or more secondary devices. The method of Claim 45 comprises receiving the digital information having a type, automatically detecting the secondary devices coupled to the computing device with routing software that compares the type with a set of values that determine where the digital information is to be transmitted, automatically sorting the digital information based on the type and automatically transmitting the digital information to a corresponding one or more of the secondary devices based on the type. As discussed above, neither Huang, Balog, Robbin nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 45 is allowable over the teachings of Huang, Balog, Robbin and their combination.

Claim 47 is dependent on the independent Claim 45. As described above, the independent Claim 45 is allowable over the teachings of Huang, Balog, Robbin and their combination. Accordingly, Claim 47 is also allowable as being dependent on an allowable base claim.

Claim 10 is dependent on the independent Claim 1. Claims 43 and 44 are dependent on the independent Claim 41. Claim 48 is dependent on the independent Claim 1. Claim 49 is dependent on the independent Claim 12. Claim 50 is dependent on the independent Claim 22. As described above, the independent Claims 1, 12, 22 and 41 are all allowable over the teachings of Huang, Balog and their combination. Accordingly, Claims 10, 43, 44 and 48-50 are all also allowable as being dependent upon an allowable base claim.

Within the Office Action, Claims 34 and 51 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Huang, Balog, Malek and further in view of Robbin. The Applicant respectfully disagrees.

Claims 34 and 51 are dependent on the independent Claim 31. As described above, the independent Claim 31 is allowable over the teachings of Huang, Balog, Malek, and their combination. Accordingly, Claims 34 and 51 are both also allowable as being dependent upon an allowable base claim.

Within the Office Action, Claims 35, 36, 38 and 39 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Huang, Balog, Malek and further in view of Mercer. The Applicant respectfully disagrees.

Claims 35, 36, 38 and 39 are dependent on the independent Claim 31. As described above, the independent Claim 31 is allowable over the teachings of Huang, Balog, Malek, and their combination. Accordingly, Claims 35, 36, 38 and 39 are all also allowable as being dependent upon an allowable base claim.

Within the Office Action, Claim 46 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Huang, Balog, Robbin and further in view of Malek. The Applicant respectfully disagrees.

Claim 46 is dependent on the independent Claim 45. As described above, the independent Claim 45 is allowable over the teachings of Huang, Balog and their combination. Accordingly, Claim 46 is also allowable as being dependent upon an allowable base claim.

Within the Office Action, Claims 53 and 54 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Huang, Balog and further in view of U.S. Patent No. 6,708,217 to Colson et al. (hereinafter “Colson”). The Applicant respectfully disagrees.

As discussed above, neither Huang, Balog nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. As further discussed above, neither Huang, Balog nor their combination teach

wherein the routing software is configured to compare the data format with a set of values that determine where the digital media content is to be transmitted. As acknowledged on page 16 of the Office Action, neither Huang, Balog nor their combination teach a computing device coupled to the server, the server including digital information.

Colson is directed to a method and system for receiving and demultiplexing multi-modal document content. Specifically, Colson teaches that each content type of the multipart document is located by a component and used to locate an appropriate content renderer. [Colson, Abstract] However, Colson does not teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. Indeed, Colson is only cited for the purpose of teaching wherein the routing software compares the data format with a set of values that determine where the digital media content is to be transmitted.

Accordingly, Colson does not teach the presently claimed invention.

Accordingly, neither Huang, Balog, Colson nor their combination teaches a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. Therefore, neither Huang, Balog, Colson nor their combination teach the presently claimed invention.

The independent Claim 53 comprises a method for routing digital information based on a routing software that compares a data format with a set of values that determine where the digital information is to be transmitted, the digital information comprising media content of different data formats from a computing device to one or more secondary devices. The method of Claim 53 comprises receiving the digital information having the data format automatically sorting the digital information based on the data format, automatically detecting the secondary devices coupled to the computing device and automatically transmitting the digital information based on the data format to a corresponding one or more of the secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog, Colson nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted *and* detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 53 is allowable over the teachings of Huang, Balog, Colson and their combination.

The independent Claim 54 comprises an apparatus for automatically routing digital media content of different data formats from a computing device to one or more secondary devices. The apparatus of Claim 54 comprises an interface coupled to receive downloaded digital media content having a data format, a storage device coupled to the interface to store the digital media content and a routing software, the routing software detects the secondary devices coupled to the computing device and to compared the data format with a set of values that determine where the digital media content is to be transmitted and a controller coupled to the storage device to automatically determine which data format of media content is routed to which secondary device utilizing a routing table, the routing table comprising a data format column and a device column and selectively transmit the digital media content based on the data format to the one or more secondary devices coupled to the computing device detected by the routing software. As discussed above, neither Huang, Balog, Colson nor their combination teach a routing software that compares the type of the digital information with a set of values that determine where the digital information is to be transmitted and detects which secondary devices are coupled to the computing device. For at least these reasons, the independent Claim 54 is allowable over the teachings of Huang, Balog, Colson and their combination.

The Applicant respectfully submits that the claims are in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, the Examiner are encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,  
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